

IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:	Wesley Craig Halbert,	:	Case No.: 17-01568 HWV
	Debtor	:	
		:	
		:	
	M&T Bank,	:	
	Movant	:	
		:	
	v.	:	
		:	
		:	
	Wesley Craig Halbert,	:	
	Respondent	:	
		:	
	And	:	
		:	
		:	
		:	
	Charles Dehart, III, Trustee,	:	
	Respondent	:	

DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM STAY FILED BY CIT BANK, N.A.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. It is denied that Debtor failed to make monthly mortgage payments in the amount of \$1,009.38 for the months of May, 2017 through October 2017; rather the mortgage payments during 2017, per the supporting documentation relative to Movant's proof of claim, were to be in the amount of \$995.
7. Denied. See response to No. 6 above.

8. Admitted in part and denied in part. It is admitted that Movant has incurred legal fees and costs as alleged. It is denied that the amount otherwise due as reflected in the motion is accurate (See response to No. 6 above).

9. Allegation No. 9 is a conclusion of law to which no response is required.

WHEREFORE, Debtor respectfully requests that the Court dismiss Movant's motion.

Respectfully submitted:

Dated: 11/17/17

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